



# COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT

10124 OLD GROVE ROAD, SAN DIEGO, CA 92131

PHONE (858) 586-2600 FAX (858) 586-2601

www.sdapcd.org

Sectors: 3, I  
Site Record ID: APCD1976-SITE-01502  
Application Record ID: APCD2015-APP-003980

PERMIT RECORD ID  
APCD2015-PTO-002316



Mavlyn Inc., DBA Rogers Auto Body  
Rody Moshy  
4837 Cass St  
San Diego CA 92109

## EQUIPMENT ADDRESS

Mavlyn Inc., DBA Rogers Auto  
Rody Moshy  
4837 Cass St  
San Diego CA 92109

## PERMIT TO OPERATE

EXPIRES: November 30, 2016

This permit is not valid until required fees have been paid.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

### EQUIPMENT OWNER

Mavlyn Inc., DBA Rogers Auto Body Rody Moshy 4837 Cass St, San Diego, CA 92109

### EQUIPMENT DESCRIPTION

Automotive coating operation consisting of one (1) custom made, enclosed spray booth.  
24' L x 14' W x 10' H. Equipped with NESHAP 6H compliant filters and a 3 HP exhaust fan.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [27R] Vehicle Refinishing Operations

BEC: APCD2011-CON-000255

### FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

1. Total usage of VOC containing materials for this operation shall not exceed an average of five (5) gallons per day. The average daily usage shall be calculated by dividing the total usage of VOC containing materials in a calendar month by the number of days on which coating operations are conducted in that calendar month. (Rule 20.2)
2. The permittee shall not use paint stripping solvents that contain methylene chloride (CAS 75-09-2) in paint removal processes. (NESHAP HHHHHH)
3. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the district, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall receive prior District approval by applying for and obtaining an authority to construct for all such modifications.
4. All materials containing volatile organic compounds shall be stored in closed containers in accordance with Rule 67.17 requirements. (Rule 67.17)
5. All materials containing volatile organic compounds (VOCs) or toxic air contaminants (TACs) shall only be applied in the booth specified above, where the exhaust fans and exhaust filters are installed and operating properly. This condition shall not apply to the following operations as defined by Rule 67.20.1: touch-up coatings, coatings applied using non-refillable hand-held aerosol spray containers, and application of body fillers. (Rule 1200 and NESHAP HHHHHH)



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6. The permittee shall not use lead pigmented coatings in any motor vehicle or mobile equipment refinishing operation.
7. The permittee shall not use or possess hexavalent chromium (chromium VI) or cadmium pigmented coatings in any motor vehicle or mobile equipment refinishing operation.  
[Title 17 CCR, Section 93112 - Hexavalent chromium and Cadmium Air Toxic Control Measure - Motor Vehicle and Mobile Refinishing Coatings.]
8. This operation shall comply with all applicable requirements in Rule 67.20.1.
9. When conducting any operations subject to Rule 67.20.1, permittee shall not use any material for surface preparation or any other surface cleaning unless its VOC content is 25 grams or less per liter of material (0.21 lbs/gal), as applied. This VOC content limitation shall not apply to any cleaning material used for the removal of dust, wax, grease, tar, or bugs provided that:
  - a) The VOC content of cleaning material does not exceed 780 grams per liter (6.5 lbs/gal), and
  - b) The cleaning material is applied by non-aerosol, hand-held spray container, and
  - c) Not more than 20 gallons per calendar year of such cleaning material are used at the stationary source. (Rule 67.20.1)
10. Any cleaning of coating application equipment, used in operations subject to Rule 67.20.1, shall comply with one of the following requirements:
  - a) The VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings; and the application equipment or equipment parts shall be cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
  - b) The VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings; and a system that totally encloses the component parts being cleaned during the washing, rinsing, and draining process shall be used.; or
  - c) The cleaning material shall not contain any exempt compounds and the VOC content of the cleaning material shall not exceed 25 grams per liter (0.21 lbs/gal), as applied; and the cleaning material shall be flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings. (Rule 67.20.1)
11. Permittee shall only apply coatings using one of the following methods: high volume low pressure (HVLP) spray application, electrostatic spray application, flow coat application, dip coat, roll coat, or hand application methods (i. e. brushes, rollers, markers, marking pens, etc.). Alternatively, an equivalent application method that has been approved by the District in writing may be used. (Rule 67.20.1/67.3)
12. Permittee shall operate any coating application equipment subject to Rule 67.20.1(d)(3)(vii) in accordance with written District approval for the application equipment. (Rule 67.20.1)
13. High volume low pressure (HVLP) and electrostatic application equipment shall be operated and maintained in accordance with the manufacturer's instructions. For HVLP equipment, the applicant will have available on site pressure gauge(s) in proper operating condition to measure the air cap pressure or have available manufacturer's technical information showing the correlation between the handle air inlet pressure and the air cap pressure.
14. If the correlation option specified above is chosen to demonstrate compliance, a handle air inlet pressure gauge will be required on site in proper operating condition to measure the handle air inlet pressure. The applicant shall maintain a permanent air pressure at the air cap of 0.1 to 10 psig.



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15. The filter used for the coating operation described above shall achieve at least 98% capture efficiency of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method Standard 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992". For the purposes of this condition, a test consistent with method 52.1 shall meet all of the following parameters:

The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi); the air flow rate across the filter shall be 150 feet per minute.

Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. (NESHAP HHHHHH)

16. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of the container that collects used gun cleaning solvent. (NESHAP HHHHHH)
17. All painters must complete a training course that meets the requirements specified in the following condition within 180 days after hiring or 180 days after the Construction Completion Notice is submitted to the District, whichever is later. This certification will be valid for five (5) years. A refresher course must be completed for re-certification every five (5) years. (NESHAP HHHHHH)
18. The painters training course shall include at a minimum hands-on demonstration and classroom instruction in:
- A. Selection, set up, and operation of spray gun equipment, including measuring coating viscosity, selecting proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate; and,
  - B. Spray techniques for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the substrate, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke; and,
  - C. Routine spray booth and filter maintenance, including filter selection and installation. (NESHAP HHHHHH)
19. The permittee shall submit a report to the District every calendar year in which information previously submitted has changed. This report should include changes associated with the initial notification required by §63.11175(a), or Notification of Compliance, or a previous annual notification of changes report submitted under this condition. This report shall include any deviations from relevant requirements under § 63.11173 (e) - (g), which includes:
- A. proper training of all painters;
  - B. use of proper application equipment (e.g. HVLP);
  - C. use of spray booth when coatings are applied, with proper ventilation and filters;
  - D. proper cleaning of application equipment. (NESHAP HHHHHH)
20. The annual notification of changes report must be submitted to the District prior to March 1 of each calendar year when reportable changes have occurred and must include the following information:
- A. the company's name and the street address (physical location) and the street address where compliance records are maintained, if different;
  - B. the name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification;
  - C. a statement of whether the source has complied with all the relevant standards and other requirements of this permit or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. (NESHAP HHHHHH)



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21. Permittee shall maintain records in accordance with Rule 67.20.1 and NESHAP HHHHHH. These records shall include the following information:
- a) A current list of coatings, precoat, primers, catalysts, thinners, additives, surface preparation materials, equipment cleaning materials, and stripping materials in use. This list shall include the following information:
    - 1. Material name, manufacturer and manufacturer identification;
    - 2. Type and applicable coating category as specified in Rule 67.20.1(d)(1) for each coating in use and the specific mix ratio;
    - 3. VOC content (actual and regulatory, as applied) for all materials containing VOC;
  - b) Current manufacturer specification sheets, material safety data sheets (MSDS), product data sheets, or technical bulletins for all materials in use, which shall list all components within each coating, precoat, primer, catalyst, thinner, additive, surface preparation, equipment cleaning, and stripping materials in use. The manufacturer specification sheets, material safety data sheets, product data sheets, or technical bulletins shall also include: the VOC content (actual and regulatory), toxic air contaminant (TAC) content weight or weight percentage, and material density (weight per volume) or material specific gravity (material density relative to the density of water) for all materials in use;
  - c) Monthly purchase and daily or monthly usage of each material containing VOCs. If monthly records are maintained, the number of operating days per calendar month shall be recorded;
  - d) Type of application equipment used;
  - e) If applicable, all District approval documentation for coating application equipment, issued in accordance with Rule 67.20.1(d)(3)(vii);
  - f) Current list of personnel by name and job description that are required to be trained;
  - g) Certification that each painter has completed the training specified in §63.11173 with the date the initial training and the most recent refresher training was completed;
  - h) Records describing the methods being used to train the painters, including demonstration that the training meets all the requirements specified in this Permit to Operate;
  - i) Manufacturer test data and control efficiency for the exhaust filter to demonstrate compliance with this permit;
  - j) Any notifications, initial or compliance status, as required by § 63.11175;
  - k) Any notification of changes reports submitted, as required by § 63.11176; and
  - l) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status or annual notification of changes report. (Rules 67.20.1, 21 and NESHAP HHHHHH)
22. All records required by this permit, including emission and usage records, shall be maintained on site for at least five (5) years and made readily available to the District upon request. (NESHAP HHHHHH)
23. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.
24. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
25. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)